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**It's Your Ship 2026:
Navigating New Waters
*Pre-Award Compliance to
Avoid Audit Findings***

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First Line of Defense for Institutional Compliance

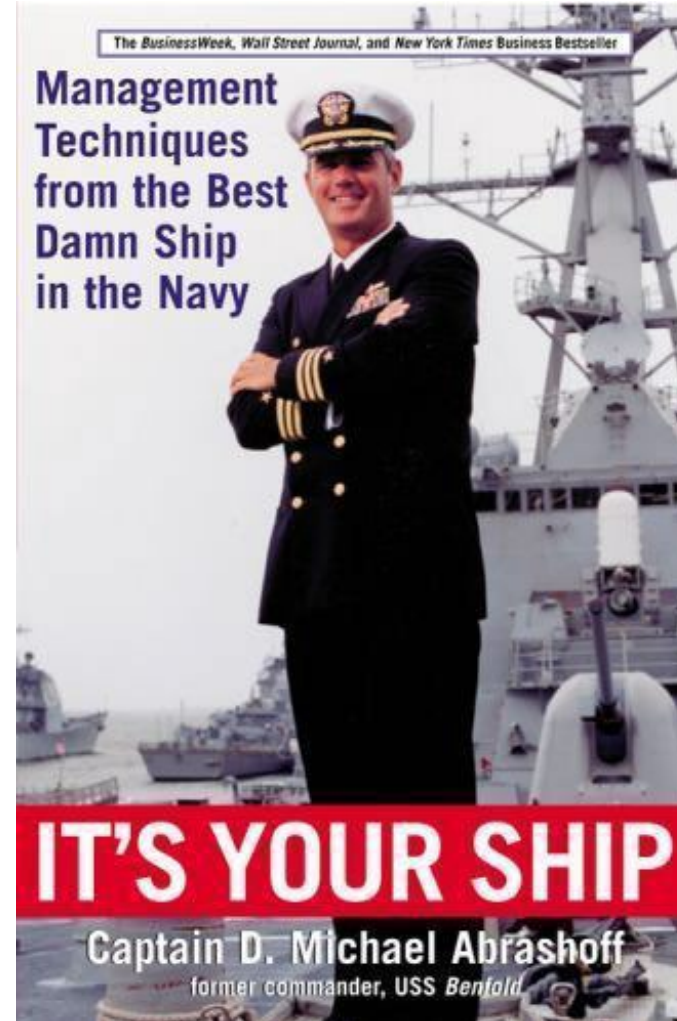


“It’s Your Ship”

Captain Michael Abrashoff was given command of a ship fitted with the latest technology, but the crew’s productivity and morale were both low

Captain Abrashoff realized that to effect change among those he commanded, he had to make some changes also

His vessel ultimately became a model of naval efficiency with high crew confidence and assurance



Background

Commissioned in 1996, the *USS Benfold* is a guided missile destroyer with a crew of 310. This is Captain Abrashoff's first sea command*.

(*This is command of a commissioned warship or various other vessels in the U. S. Navy.)

During this time, about 35% of men and women who joined the military annually would not complete their enlistment contract.

At the time of this command, each sailor trainee costs about \$35k to recruit and tens of thousands more to train to basic proficiencies. Today the cost of recruitment is \$9,400 - \$13,500. However, the training cost now averages \$84k.

"The whole secret of leading a ship or managing a company is to articulate a common goal that inspires a diverse group of people to work hard together."

Empowerment and Ownership

- Research shows an empowered workforce results in a stronger commitment to the workplace, but not all “empowering” activities yield the same results. Employees respond differently!
 - Define what “empowerment” is to your staff – it generally isn’t a one-stop-shop. Commitment by a supervisor to a staff given the freedom to be innovative will define the culture of the workplace.
- How do you empower?
- ✓ Clear ownership of proposal components
 - ✓ Define roles for budget review, compliance checks, and submission authority

We spend an estimated 1/3 of our lives in a workplace environment. The freedom to take on new responsibilities, make changes, and release the worry of criticism usually results in employee satisfaction and a positive and productive work environment.

Trust Through Consistency

- In a pre-award environment, trust is built through consistency, transparency, and sound judgment. When staff trust their leaders and processes, they are more engaged, exercise stronger ethical decision-making, and take ownership of compliance responsibilities.
- Steps to building operational trust
 - ✓ Investigators trust pre-award offices when guidance is consistent, timely, and accurate.
 - ✓ Trust is reinforced when compliance reviews are predictable, not punitive
 - ✓ Pre-award compliance succeeds when investigators understand why requirements exist—not just that they exist.

Regulatory Fluency

- Continuous learning in the workplace can expand employee skills, increase existing skills and knowledge, generate new ideas, boost morale and raise employee performance
 - A strategy for continuous learning develops long-term goals and uses tools and resources to support and reach those goals. These include accessible need-based learning opportunities, a culture that fosters sharing knowledge, feedback from students and those with knowledge to share, and an environment to apply the new knowledge and skills
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- ❑ Benefits of continuous learning – a win for both sides
 - ✓ Sponsor-specific rules (NIH vs. NASA vs. DOD)
 - ✓ Uniform Guidance Cost-Principles
 - ✓ Institutional policy alignment

Compliance Communication

- Exchange of ideas, thoughts, opinions, knowledge, and information that is received and comprehended clearly and purposefully.
- Balancing act of active listening, verbal communication, nonverbal cues, body language and emotional intelligence.
- ❑ Tips for Compliance Communication in the Workplace
 - ✓ Translating sponsor guidance into investigator-friendly language
 - ✓ Communicating risk without discouraging innovation
 - ✓ Documenting decisions and deviations
 - ✓ Watch body language and voice
 - ✓ Prioritize two-way communication
 - ✓ Keep it to facts, not stories
 - ✓ Speak to the right person

“Lead by example; listen aggressively; communicate purpose and meaning; create a climate of trust; look for results, not salutes; take calculated risks; go beyond standard procedure; build up your people; generate unity; and improve your people’s quality of life.”

Modeling Compliant Behavior

- A leadership style that involves setting an example through your own actions, behaviors, and attitudes.
- Demonstrate qualities and behaviors that you expect from our team members and modeling the behaviors that you want to see in your workplace.

❑ Benefits:

- ✓ builds trust and respect
- ✓ Sets the bar high
- ✓ Inspired others
- ✓ Creates a positive workplace
- ✓ Encourages accountability

❑ Put this into practice

- ✓ Meeting internal deadlines
- ✓ Using approved templates
- ✓ Enforcing review requirements uniformly

“The best way to improve performance is to focus on preparation, not punishment..”

Pre-Award Compliance Checklist: *Mission Readiness Before Proposal Submission*

☐ Sponsor & Eligibility:

- ✓ Confirm sponsor eligibility (institution, PI, foreign components, resubmissions)
- ✓ Verify funding mechanism and solicitation requirements
- ✓ Identify sponsor-specific rules and exceptions early

☐ Proposal Development:

- ✓ Proposal aligns with sponsor guidelines and page limits
- ✓ Required components included (technical, budget, biosketches, facilities, data plans)
- ✓ Internal deadlines met to allow full compliance review

☐ Budget & Cost Principles:

- ✓ Costs are allowable, allocable, reasonable, and consistently treated.
- ✓ Salary, effort, and cost sharing (if allowed) are justified and compliant
- ✓ Subrecipient vs. contractor determination completed and documented

Pre-Award Compliance Checklist: *Mission Readiness Before Proposal Submission - continued*

Compliance & Regulatory Review:

- ✓ Conflict of Interest/Commitment disclosures current and reviewed
- ✓ Human subject, animal use, export control, and data security considerations identified
- ✓ Required approvals initiated or documented (as applicable)

Certifications & Representation:

- ✓ Institutional certifications and assurances verified (SAM.GOV)
- ✓ PI and key personnel compliance attestations completed
- ✓ Sponsor-and system-specific forms validated

Final Review & Submission:

- ✓ Roles and responsibilities clearly documented
- ✓ Proposal reviewed for accuracy, completeness, and risk
- ✓ Authorized Institutional submission completed on time

“The best way to reduce errors is to avoid punishing people for making mistakes.”

Common Pre-Award Compliance Misses: *Where Risk Typically Enters the Proposal*

❑ Eligibility & Solicitation Review:

- ✓ Assuming PI or Institutional eligibility without verification
- ✓ Overlooking sponsor-specific restrictions or required registrations

❑ Budget Development:

- ✓ Including unallowable or poorly justified costs
- ✓ Misclassifying subrecipients vs. contractors

❑ Effort & Cost Sharing:

- ✓ Inconsistent or unrealistic effort commitments
- ✓ Unapproved or undocumented cost sharing

❑ Compliance Requirements:

- ✓ Late identification of human subjects, animals, export control, or data security issues
- ✓ Outdated or mission COI/COC disclosures

❑ Proposal Review & Submission:

- ✓ Rushing final review due to missed internal deadlines
- ✓ Incomplete certifications or unauthorized submission.

What Pre-Award Leaders Do Differently?

- ❑ They Lead with Clarity
 - ✓ Set clear expectations for compliance, roles, and internal deadlines
 - ✓ Explain not just what is required, but why it matters
- ❑ They Normalize Early Risk Conversations
 - ✓ Encourage staff to raise concerns without fear or blame
 - ✓ Address compliance questions before proposal development is finalized
- ❑ They Apply Rules Consistently
 - ✓ Use the same standards regardless of investigator, sponsor, or funding size
 - ✓ Avoid shortcuts that create long-term institutional risk
- ❑ They Invest in Judgment, Not Just Process
 - ✓ Develop staff confidence to interpret sponsor guidance and policy
 - ✓ Support professional growth through mentoring and continuous learning
- ❑ They View Pre-Award as Mission Readiness
 - ✓ Treat compliance as an enable of successful awards
 - ✓ Measure success by defensible submission, not just volume

“If you want to create a culture of excellence, you have to give people ownership of the mission.”

Take Away



- ❑ Compliance is not a checkpoint. It is a leadership function.
- ❑ If the ship fails, it's a leadership issue—not a crew issue.
- ❑ Risk enters before submission, not after.
- ❑ Freedom + accountability = high performance.
- ❑ Trust removes fear—and fear hide's risk.
- ❑ Static knowledge = compliance risk.
- ❑ If investigators don't understand it, they won't follow it.
- ❑ If leadership cuts corners, compliance collapses.

Thank you !

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